

September 27, 1988
L-6500-JTJ-021



WASTE MANAGEMENT BRANCH

To: Charles F. Findley
Director, Hazardous Waste Division
U. S. Environmental Protection Agency
Region Ten
1200 Sixth Avenue
Seattle, Washington 98101

Subject: Notice of Violation, HW-112

Dear Mr. Findley:

The purpose of this letter is to address the compliance schedule presented in the Notice of Violation received September 1, 1988, specifically the points raised in section I.

1. Adequate warning signs were not posted as described at the time of the inspection. Enclosed are photos of the signage now posted at the site. They were posted on September 7, 1988.
2. The inspection team asked for specific training records for two individuals and no other training records were requested. We are now providing records as of the last monthly report for all other employees at the site who are involved in hazardous waste management. The enclosed records were maintained at the time of the inspection.
3. As explained to the inspection team at the time of the inspection, Boeing maintains its own Fire, Police, and Medical services. These organizations are the responders to any emergency situation at our facility. Unlike many companies which may have similar small operations, Boeing's trained, and well organized operations. In fact the local fire, police, and medical facilities often look to us to back them up in emergencies. Long standing working agreements exist between Boeing and these local facilities. Likewise, the SARA Title 3 reports submitted in 1988 informed the local fire departments of the hazardous chemicals stored on our facility, where stored, how stored, and how much, and on the MSDS sheets, the hazards to be expected from these chemicals. We have enclosed documents which describe arrangements with the Tukwila Fire Department, King County Office of Emergency Management, and Crowley Environmental Services. Each document is an excerpt

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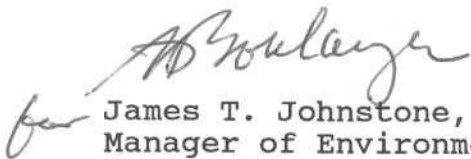
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from the arrangement with the entity, and is accompanied by a memorandum of explanation from the appropriate Boeing organization. Moreover, enclosed herewith are copies of letters from the local fire, police, and emergency response organizations acknowledging review of our SPCC and emergency response plans.

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4. An evacuation plan was submitted to the inspection team. Enclosed herewith is a copy of the revised contingency plan. It fully addresses all items required by 40 CFR 265.52 (f).
5. We believe that the closure plan as submitted to the inspection team included all items required by 40 CFR 265.122 (B) except for a statement on other activities not required at this site. We have, however, added additional explanation to the plan that addresses each of the elements required to be in the closure plan.
6. One container of hazardous waste restricted from land disposal was not dated properly at the time of the inspection. Boeing Advanced Systems Environmental Affairs inspectors now tour the facility daily to confirm that all containers of hazardous waste are properly dated and labeled.

We hope that this response will satisfy the letter and intent of your compliance order. If you have any questions or we can be of any further assistance in this matter please call me.



James T. Johnstone, P.E.
Manager of Environmental Affairs
Boeing Advanced Systems
L-6500 M/S 46-89
phone 544-2886

cc: Marc Horton, Washington Department of Ecology
Julie Selleck, Washington Department of Ecology -
Northwest Region

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